

R E M A R K S

Claims 1-6 and 10-20 are pending. Claims 1, 10, 14, and 20 are amended. Re-examination and reconsideration are requested.

In the office action, dated May 5, 2005, the examiner rejected claims 1, 2, 4-6, 10, 11, 13-17, 19, and 20 under 35 U.S.C. §103(a) as being unpatentable over Twigg, U.S. Patent No. 5,227,954 (Twigg). The examiner rejected claims 3, 12, and 18 under 35 U.S.C. §103(a) as being unpatentable over Twigg in view of Pitz *et al.*, U.S. Patent No. 6,240,058 (Pitz).

10 Re the Claims:

Claims 1, 10, and 20 are amended to clarify that the first, second, and third cartridge receiving devices are mounted to respective first, second, and third sets of mounting locations provided on the lower and upper plates.

15 Claim 14 is amended to clarify that the first, second, and third cartridge receiving means are mounted to respective first, second, and third sets of mounting locations provided on the lower and upper plates.

Re the Section 103 Rejections based on Twigg:

20 The examiner rejected claims 1, 2, 4-6, 10, 11, 13-17, 19, and 20 under Section 103(a) as being obvious in view of Twigg. These rejections are improper in that Twigg fails to provide the suggestion or incentive required to motivate a person having ordinary skill in the art to modify the Twigg structure in the 25 manner required by the pending claims. That is, Twigg cannot be used to establish a *prima-facie* case of obviousness.

Twigg discloses an arrangement for mounting a disk drive or drives (20) in a drive dock (21). Twigg's mounting arrangement utilizes a pair of plates (e.g., 22R and 22L) having a number of 30 tracks (e.g., 41, 42, 43, and 44) formed therein. The plates are attached opposite one another on the inside walls of the drive

5 dock (e.g., 21). A pair of brackets (e.g., 23R and 23L) are screwed to a disk drive via screws (e.g., 24RF, 24RR, 24LF, and 24LR). After the brackets are screwed to the disk drive, the heads of the screws are slidably received by the tracks formed in the plates. The brackets are then secured to threaded studs (e.g., 25R and 25L) provided on the drive dock by "kep nuts" (25R1 and 25L1).

10 Accordingly, Twigg describes an arrangement wherein the disk drive (20) is mounted to the drive dock (21) (e.g., via brackets 23R and 23L), and not to the plates (22R and 22L). Twigg's mounting arrangement allows the drives to be easily removed from the drive dock by simply removing the "kep nuts" from the studs on the drive dock, then sliding the drive out of the drive dock. Thus, there is no need in Twigg to first remove the drive dock 15 from the computer. This is a stated advantage of the Twigg arrangement. See, for example, col. 1, lines 26-31 of Twigg.

20 Claim 1 of the present invention is directed to a reconfigurable cartridge processing module wherein the various cartridge receiving devices are mounted to the lower and upper plates. More specifically, in the first component configuration, first and second cartridge receiving devices are mounted to respective first and second sets of mounting locations provided on the lower and upper plates. In the second component configuration, a third cartridge receiving device is mounted to 25 a third set of mounting locations provided on the upper and lower plates.

30 The Twigg reference does not meet at least the limitations of claim 1 that relate to the mounting of the cartridge receiving devices on the lower and upper plates. To the contrary, in Twigg, the disk drive is mounted (via the brackets) to the drive dock 21. Twigg's disk drive is not mounted to his plates. The reason that Twigg mounts the disk drive to the drive dock and not the plates is because Twigg desires the drive to be removable from the drive dock, but without the need to first remove the 35 drive dock from the computer. See for example, the description

at col. 1, lines 26-31 of Twigg. If Twigg mounted the disk drive to the plates instead of the drive dock, this purpose would be defeated. That is, the drive dock would have to be removed from the computer before the drive could be removed from the plates.

5 Because modifying the Twigg arrangement to mount the disk drive directly to the plates would defeat a stated objective of the Twigg reference, Twigg cannot be said to provide the suggestion or incentive required to modify his device in a way that would defeat this objective. Stated another way, in Twigg 10 there is no need, thus no suggestion or incentive, to modify his mounting arrangement in a manner that would defeat a stated objective of his invention. Consequently, the Twigg reference cannot support a *prima-facie* case of obviousness of the pending claims. Thus, claim 1 is allowable over Twigg.

15 Claims 2-6, are allowable at least because they depend from claim 1, which is allowable over Twigg.

Claim 10 is allowable over Twigg because Twigg fails to provide the suggestion or incentive that would motivate a person having ordinary skill in the art to modify the Twigg arrangement 20 in the manner required by claim 10.

Amended claim 10 requires that the various cartridge receiving devices be mounted to various respective sets of mounting locations provided on the lower and upper plates. This 25 is not the arrangement described in Twigg. Instead, Twigg mounts his disk drive to the drive dock 21, not to the plates 22R and 22L. Moreover, because Twigg specifically desires the disk drive to be removable from the drive dock without the need to remove the drive dock from the computer, Twigg cannot be said to provide the suggestion or incentive to modify his mounting arrangement 30 to mount the disk drive directly to the plates. Consequently, claim 10 is not obvious in light of Twigg.

Claims 11-13 are allowable at least because they depend from claim 10, which is allowable over Twigg.

Claim 14 is allowable over Twigg in that Twigg does not 35 provide the suggestion or incentive required to motivate a person

having ordinary skill in the art to modify the Twigg arrangement in the manner required by claim 14.

Claim 14 requires that the first, second, and third cartridge receiving means be mounted to respective first, second, and third sets of mounting locations that are provided on the lower and upper plates. Twigg does not disclose or suggest this arrangement. To the contrary, Twigg mounts his disk drive to the drive dock 21, not to the plates 22R and 22L. In addition, because Twigg specifically desires the disk drive to be removable from the drive dock without the need to remove the drive dock from the computer, Twigg cannot be said to provide the suggestion or incentive to modify his mounting arrangement to mount the disk drive directly to the plates, which would require the drive dock to be removed first. Consequently, claim 14 is not obvious over Twigg.

Claims 15-19 are allowable at least because they depend from claim 14, which is allowable over Twigg.

Claim 20 is allowable over Twigg in that Twigg does not provide the suggestion or incentive required to motivate a person having ordinary skill in the art to modify the Twigg arrangement in the manner required by claim 20.

Claim 20 requires at least defining a first component configuration by mounting first and second cartridge receiving devices to corresponding first and second sets of mounting locations provided on the lower and upper plates. Claim 20 also requires at least defining a second component configuration by mounting a third cartridge receiving device to a third set of mounting locations provided on the lower and upper plates. Twigg does not disclose or suggest such a mounting method. Instead, Twigg mounts his disk drive to the drive dock 21, not to the plates 22R and 22L. Furthermore, because Twigg specifically desires the disk drive to be removable from the drive dock without the need to remove the drive dock from the computer, Twigg cannot be said to provide the suggestion or incentive to modify his mounting method to involve mounting the disk drive

directly to the plates, which would require the drive dock to be removed. Consequently, claim 20 is not obvious over Twigg.

Re the Section 103 Rejections based on Twigg and Pitz:

The examiner rejected claims 3, 12, and 18 under Section 103(a) as being unpatentable over Twigg in view of Pitz. These rejections are improper in that neither reference, taken alone or in combination, provides the suggestion or incentive required to motivate a person having ordinary skill in the art, and with no knowledge of the present invention, to modify the structures disclosed in Twigg and Pitz in the manner required by the rejected claims. Consequently, claims 3, 12, and 18 are allowable over Twigg and Pitz.

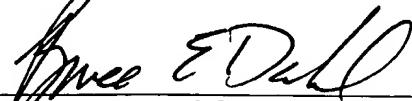
As discussed above, Twigg fails to provide the suggestion or incentive required to motivate a person having ordinary skill in the art to modify his mounting arrangement in the manner required by the pending claims because to do so would defeat a stated objective of the Twigg reference. Pitz provides no suggestion or incentive to that would motivate a person having ordinary skill in the art to modify Twigg in a manner that would defeat this stated objective, either. Thus, even if Twigg and Pitz were to be combined, no combination of Pitz and Twigg would result in a structure that meets the limitations of claims 3, 12, and 18. That is, the resulting structure would still fail to meet the limitations in independent claims 1, 10 and 14 that relate to the mounting of the cartridge receiving devices (in the case of claims 3 and 12) or the cartridge receiving means (in the case of claim 18) to the lower and upper plates. Consequently, claims 3, 12, and 18 are allowable over Twigg and Pitz.

Applicants believe that all of the claims pending in this patent application are allowable and that all other issues raised by the examiner have been rectified. Therefore, applicants respectfully request the examiner to reconsider the rejections and to grant an early allowance. If any questions or issues

remain to be resolved, the examiner is requested to contact the applicants' attorney at the telephone number listed below.

Respectfully submitted,

DAHL & OSTERLOTH, L.L.P.



5
•
10

Bruce E. Dahl, Esq.
Attorney for Applicant
PTO Registration No. 33,670
555 17th Street, Suite 3405
Denver, CO 80202
(303) 291-3200

Date: 8-2-05